

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE**

EUGENIA VEGA

Plaintiff,

v.

**REBECCA LYNN METZ, and
CELADON TRUCKING SERVICES, INC.**

Defendants.

)
)
)
)
)
)
)
)
)
)
)

Case No: _____

NOTICE OF REMOVAL

Comes now Celadon Trucking Services, Inc., through counsel, and as its grounds for removal of this matter now states:

1. On September 21, 2017, Plaintiff Eugenia Vega filed his Complaint in the Circuit Court of Madison County, Tennessee for the Twenty-Sixth Judicial District at Jackson, against the above-named defendants bearing docket number C-17-249.

2. A copy of the Summons and Complaint, which were served upon Celadon Trucking Services, Inc. through the Tennessee Secretary of State on September 29, 2017 are attached hereto and filed herewith. These are all of the process, pleadings and orders which have been served upon Celadon Trucking Services, Inc. in this matter.

3. Plaintiff Eugenia Vega was at the time of the commencement of said action and still is a citizen and resident of the State of Texas and no other state.

4. Celadon Trucking Services, Inc. was at the time of the commencement of said action and still is a New Jersey corporation with its principal place of business in Indiana and no other state.

5. Rebecca Lynn Metz is identified as a defendant and was at the time of the commencement of said action and still is an adult, resident citizen of the State of Indiana and no

other state.

6. The amount in controversy in said action exceeds the sum or value of Seventy-Five Thousand and 00/100 Dollars (\$ 75,000.00), exclusive of interest and costs; is wholly between the citizens of different States; is within the jurisdiction of this Court pursuant to the provisions of 28 U.S.C. § 1332 and is removable to this Court pursuant to the provisions of 28 U.S.C. § 1441.

WHEREFORE, PREMISES CONSIDERED, Celadon Trucking Services, Inc. prays this Court accept this Notice and proceed with the action heretofore referred to in accordance with law.

Respectfully submitted,

FEENEY & MURRAY, P.C.

By: s/ John Thomas Feeney

John Thomas Feeney

BPRN 11482

Attorneys for Celadon Trucking Services, Inc.

424 Church Street, Suite 2230

Nashville, Tennessee 37219

(615) 242-3700

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that I have forwarded a true and correct copy of the foregoing, **via United States Mail, postage prepaid**, to:

Brian Lee Nash

1049 West Main Street, Suite 202

Franklin, TN 37064

This, the 4th day of October, 2017.

s/s John Thomas Feeney

John Thomas Feeney